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LETTER FROM U S EPA REGION I REGARDING COMMENTS TO DRAFT FINAL SAMPLING  
AND ANALYSIS PLAN DATA GAPS ASSESSMENT CATEGORY 1 AREAS TANK FARM 1 NS  
NEWPORT RI  
3/26/2012  
U S EPA REGION I



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I**

5 Post Office Square, Suite 100  
Boston, MA 02109-3912

March 26, 2012

Mr. Roberto Pagtalunan  
NAVFAC MIDLANT (Code OPNEEV)  
Environmental Restoration  
Building Z-144, Room 109  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Draft Final Sampling and Analysis Plan, Data Gaps Assessment, Category 1 Areas, Tank Farm 1

Dear Mr. Pagtalunan:

Thank you for the opportunity to review the *Draft Final Sampling and Analysis Plan for the Data Gaps Assessment at Category 1 Areas in Tank Farm 1* at the Naval Education and Training Center in, Newport, Rhode Island, dated March 2012 (SAP). The document presents the sampling design and rationale and the analytical and data assessment requirements for the project in accordance with the requirements of the *Uniform Federal Policy for Quality Assurance Plans* and *EPA Guidance for Quality Assurance Project Plans*. Detailed comments are provided in Attachment A.

Please include figures confirming the groundwater contours/groundwater flow direction at Tank Farm 1.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the Tank Farms. Please do not hesitate to contact me at (617) 918-1385 should you have any questions or wish to arrange a meeting.

Sincerely,

Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Pamela Crump, RIDEM, Providence, RI  
Darlene Ward, NETC, Newport, RI  
Steven Parker, Tetra Tech-NUS, Wilmington, MA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 34, §11.3.1	Please correct the first sentence to refer to Figures 3, 5, and 6 (because the transformer vaults have been added).
p. 43, Worksheet 15a	The project screening levels in this worksheet have changed from the draft version of the SAP. Protection of groundwater soil screening levels (SSLs) have been deleted presumably because groundwater use for drinking water is not an expected future use and also many of the screening levels were below detection levels. Navy please clarify the rationale for the change. If contaminants are detected in groundwater the soil analytical data collected will be reviewed and compared to protection of groundwater soil screening levels. If there are groundwater contaminants for which the detection level in the soil samples exceeds the protection of groundwater SSLs a decision will be required as to what, if any, additional investigation will be required.
p. 59, Table 17-1	Three sampling locations shown on Figure 5 are missing from this table. Please add sampling locations EBP-SB1020 through EBP-SB-1022.
p. 61, Worksheet 18	Please update this worksheet to include sampling locations EBP-SB1020 through EBP-SB-1022.
p. 62, Worksheet 19	For aqueous samples with SVOCs analyses, please replace method CA-204 with CA-226 (correction was made for the soil matrix but not the aqueous matrix).
p. 64, Worksheet 20	Please update this worksheet to include the additional soil samples for the ethyl blending plant and the samples for the transformers. Also, update the quality control sample requirements as necessary.
p. 77, Worksheet 25	For SVOCs/PAHs please add SOP reference CA-226 as appropriate.
p. 107, Worksheet 37	Remove the last two sentences in the first paragraph regarding the use of rejected data.
Appendix D	Most but not all of the forms were updated to refer to Tank Farm 1 rather than Tank Farm 2. Please make the remaining corrections.
Appendix E, p. E-2-2	The first sentence in the second full paragraph should refer to each interval to be collected, not each interval to be sampled because PID screening is required for all soil intervals.